

United States District Court

SOUTHERN DISTRICT OF FLORIDA-MIAMI DIVISION

MARIA ELENA CHAVEZ LETONA, <div style="text-align: center;">Plaintiff,</div> vs. AMOR DE JESUS, CORP., SWEET LIVING FACILITY INC., JOSE MACHADO, ZELMIRA QUINONEZ, and AMINTA QUINONEZ, <div style="text-align: center;">Defendants.</div>		PLAINTIFF'S TRIAL WITNESS LIST CASE NO.: 1:23-CV-24299-MORENO	
PRESIDING JUDGE HONORABLE FEDERICO A. MORENO	PLAINTIFF'S ATTORNEY FAIRLAW FIRM Brian H. Pollock, Esq. 135 San Lorenzo Ave Suite 770 Coral Gables, FL 33146	DEFENDANT'S ATTORNEY LAW OFFICE OF EMMANUEL PEREZ & ASSOCIATES, P.A. Emmanuel Perez, Esq. 901 Ponce De Leon Blvd., Suite 101 Coral Gables, FL 33134	
TRIAL DATE(S)		COURT REPORTER	
		COURTROOM DEPUTY	
PLF. NO	LIVE or BY DEPOSITION	WITNESS	DESCRIPTION
1	Live	Maria Elena Chavez Letona	Ms. Chavez Letona is expected to testify regarding her employment with Defendants, the type of work she performed for them, her responsibilities, her hours worked, pay received from them, how and when paid, where she worked, what she did, who told her when and where to work, the documentation she created that would have allowed her to identify the dates and times she worked, the wages owed to her, and consistent with her deposition, plus such on other issues raised by the pleadings and as identified in her discovery responses.

2	Live	Aminta Quiñonez	<p>Ms. Quiñonez is expected to testify that her husband, Jose Machado, is identified as an officer of Amor de Jesus, that she shares financial responsibility of Amor de Jesus with him, her education, training, experience, licensure, certifications, and responsibilities as they relate to the corporate Defendants, her understanding of the documentation requirements imposed on Defendants, the results of AHCA inspections, her destruction of documents, the lack of time records, how Plaintiff was paid, the nature of the Defendants' business and the care to be provided by Plaintiff, the destruction of WhatsApp messages that she exchanged with the Plaintiff, the destruction of the iMessages she exchanged with the Plaintiff, her (mis)classification of workers, her responsibilities and duties for Defendants, staffing requirements for her facilities, who is billed and who pays for the residents at her facilities, her signing contracts with payors, her work with her mother, Zelmira Quiñonez, the other regulations the Defendants were required to comply with for their assisted living facilities, the lack of a good faith basis for violating the FLSA, any inconsistencies with her deposition, plus such on other issues raised by the pleadings and as identified in her discovery responses.</p>
3	Live	Zelmira Quiñonez	<p>Ms. Quiñonez is expected to testify that her son-in-law, Jose Machado, is identified as an officer of Amor de Jesus, that her daughter Aminta Quiñonez and Mr. Machado share financial responsibility of Amor de Jesus, her financial responsibility of Sweet Living Facility, her education, training, experience, licensure, certifications, and responsibilities as they relate to the corporate Defendants, her understanding of the documentation requirements imposed on Defendants, the results of AHCA inspections, her destruction of documents, the lack of time records, how Plaintiff was paid, the nature of the Defendants' business and the care to be provided by Plaintiff, the destruction of</p>

			WhatsApp messages that she exchanged with the Plaintiff, her (mis)classification of workers, her responsibilities and duties for Defendants, staffing requirements for her facilities, who is billed and who pays for the residents at her facilities, her signing contracts with payors, her work with her daughter, Aminta Quiñonez, the other regulations the Defendants were required to comply with for their assisted living facilities, the lack of a good faith basis for violating the FLSA, any inconsistencies with her deposition, plus such on other issues raised by the pleadings and as identified in her discovery responses.
4	Live	Jose Machado	Mr. Machado is expected to testify that he is identified as an officer of Amor de Jesus, that he shares financial responsibility of Amor de Jesus with his wife Aminta Quiñonez, his education, training, experience, licensure, certifications, and responsibilities as they relate to the corporate Defendants, his involvement in the day-to-day business operations of Amor De Jesus, his understanding of the documentation requirements imposed on Defendants, the results of AHCA inspections, Defendants' destruction of documents, the lack of time records, how Plaintiff was paid, the nature of the Defendants' business and the care to be provided by Plaintiff, his (mis)classification of workers, his responsibilities and duties for Defendants, staffing requirements for his facilities, who is billed and who pays for the residents at his facilities, his signing contracts with payors, his work with his mother-in-law Zelmira Quiñonez, the other regulations the Defendants were required to comply with for their assisted living facilities, the lack of a good faith basis for violating the FLSA, any inconsistencies with his deposition, plus such on other issues raised by the pleadings and as identified in her discovery responses.

5	Live	Yanny Melania Soler	Ms. Soler is the Plaintiff's daughter and is expected to testify regarding her knowledge of the payments Defendants made to her bank account for work performed by Plaintiff, the hours Plaintiff worked for Defendants, and her discussions with the Plaintiff regarding these and other issues raised by the pleadings.
6	Live	Otilia Reyes	Ms. Reyes lives near the assisted living facility operated by Defendants and is expected to testify about Plaintiff's work for Defendants, the hours Plaintiff worked, the hours she observed others to have worked, and assisting Plaintiff with transportation to/from work by arranging Uber rides for her.
7	Live	Carmen Del Toro	Ms. Del Toro was a resident of Amor De Jesus, Corp. during Plaintiff's work for Defendants and is expected to testify about Plaintiff's work for Defendants, the hours Plaintiff worked, and the hours she observed others to have worked.
8	Live	Lynn Pollack	Ms. Pollack was a resident of Amor De Jesus, Corp. during Plaintiff's work for Defendants and is expected to testify about Plaintiff's work for Defendants, the hours Plaintiff worked, and the hours she observed others to have worked.
9	Live	Maria Castano	Ms. Castano was a resident of Amor De Jesus, Corp. during Plaintiff's work for Defendants and is expected to testify about Plaintiff's work for Defendants, the hours Plaintiff worked, and the hours she observed others to have worked.
10	Live	Rita Soberon	Ms. Soberon was a resident of Amor De Jesus, Corp. during Plaintiff's work for Defendants and is expected to testify about Plaintiff's work for Defendants, the hours Plaintiff worked, and the hours she observed others to have worked.
11	Live	Rebeca Sanchez	Ms. Sanchez was a resident of Amor De Jesus, Corp. during Plaintiff's work for Defendants and is expected to testify about Plaintiff's work for Defendants, the hours Plaintiff worked, and the hours she observed others to have worked.

12	Live	Odalys Cintas	Ms. Cintas was a resident of Amor De Jesus, Corp. during Plaintiff's work for Defendants and is expected to testify about Plaintiff's work for Defendants, the hours Plaintiff worked, and the hours she observed others to have worked.
13	Live	Ernestina Suarez	Ms. Suarez worked as a caretaker for Amor De Jesus, Corp. and is expected to testify about Plaintiff's work for Defendants, the hours Plaintiff worked, and the hours she worked.
14	Live	Nilda Machado	Ms. Machado worked as a caretaker for Amor De Jesus, Corp. and is expected to testify about Plaintiff's work for Defendants, the hours Plaintiff worked, and the hours she worked.
15	Live	Nelson Fernandez	Mr. Fernandez is the son of one of Amor De Jesus Corp.'s deceased residents, Maria Fernandez, and is expected to testify about Plaintiff's work for Defendants, the hours Plaintiff worked, and the hours she observed others to have worked.
16	Live	Dolores Garcia	Ms. Garcia was a resident of Sweet Living Facility Inc. during Plaintiff's work for Defendants and is expected to testify about Plaintiff's work for Defendants, the hours Plaintiff worked, and the hours she observed others to have worked.
17	Live	Julio Garcia	Mr. Garcia was a resident of Sweet Living Facility Inc. during Plaintiff's work for Defendants and is expected to testify about Plaintiff's work for Defendants, the hours Plaintiff worked, and the hours she observed others to have worked.
18	Live	Leonardo Rodriguez	Mr. Rodriguez was a resident of Sweet Living Facility Inc. during Plaintiff's work for Defendants and is expected to testify about Plaintiff's work for Defendants, the hours Plaintiff worked, and the hours she observed others to have worked.

Plaintiff reserves the right to supplement this Trial Witness List.

Respectfully submitted this 30th day of October 2024.

s/ Patrick Brooks LaRou
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